

### **REMARKS/ARGUMENTS**

In response to the detailed Office Action dated December 13, 2007, the Applicant offers the following submissions.

#### **35 U.S.C. §103 - Claims 1 and 5**

Claims 1 and 5 stand rejected as obvious in light of US application 2002/0180834 to Silverbrook in view of US application 2002/0005878 to Moon. The Applicant disagrees.

It is well established that the cited references must teach all the elements of a claim in order to render it obvious. Claim 1 requires “that each of the printhead modules are *arranged to be individually mounted and detached from the casing as single modular components*” (emphasis added). Each printhead module has a support frame and at least two printhead integrated circuits. The Examiner has equated the printed circuit board 42 to be the support structure, and the printhead modules 46 to be the printhead integrated circuits. The printed circuit board 42 and printhead modules 46 are separate components that are not constructed for combined installation and removal from the casing as a single modular component.

It is plainly apparent from Figure 8 of the Silverbrook reference, that the PCB 42 is unscrewed from the chassis molding 64 to release the flex PCBs 58 to allow individual modules 46 to be removed. The PCB 42 and the flex PCBs 58 are connected by pressure on their contacts only (see paragraph 85). They are not structurally interconnected and when the PCB 42 is unscrewed from the chassis molding 64, the PCB 42 and the modules 46 are physically separate parts.

In light of the above, the cited references fail to teach a printhead assembly with the elements of claim 1. In particular, Silverbrook and Moon both lack disclosure of printhead modules (as defined by claim 1) that are unitary components that can be individually installed or removed from the casing.

Moon teaches a single printhead IC 102 mounted to a larger support in the printhead. It is silent as to a printhead module with two or more printhead ICs each.

The cited references do not teach all the elements of claim 1 or claim 5. Accordingly, the citations do not support a §103 rejection of claims 1 or 5.

#### **35 U.S.C. §103 – Claim 2**

Claim 2 stands rejected as obvious in light of '834 to Silverbrook and '878 to Moon in view of US 5,658,158 to Milan.

As discussed above, '834 and '878 fail to disclose a module with all the elements and functional capabilities defined by claim 1. The disclosure in Milan also fails to teach or suggest these elements. As claim 2 incorporates these elements by virtue of its indirect dependence from claim 1, it is clear that the citations fail to support a rejection on the basis of §103.

### **35 U.S.C. §103 – Claim 3 and 4**

Claims 3 and 4 stand rejected as obvious in light of '834 to Silverbrook and '878 to Moon in view of US 5,658,158 to Milan and US 6,180,002 to Higgins.

As discussed above, '908 and Milan fail to teach or suggest several elements defined in claim 2. The disclosures in Higgins and '834 also fail to teach or suggest these elements. As claims 3 and 4 incorporate these elements by virtue of indirect dependence from claim 2, it is clear that the citations fail to support a rejection on the basis of §103.

### **Conclusion**

It is respectfully submitted that the Examiner's rejections have been successfully traversed and the application is now in condition for allowance. Accordingly, favorable reconsideration is courteously solicited.

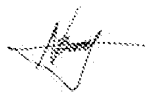
Very respectfully,

Applicant/s:



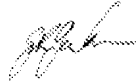
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